

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

OLD LADDER LITIGATION CO., LLC,

Plaintiff,

v.

INVESTCORP BANK B.S.C. et al.

Defendants.

No. 1:08-cv-0876 (RMB-THK)

**MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Eric J. Grannis, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of


**Applicant's Name:** Gregory Warren Werkheiser  
**Firm Name:** Morris, Nichols, Arsht & Tunnell LLP  
**Address:** Chase Manhattan Centre, 18th Floor  
1201 North Market Street  
**City/State/Zip:** Wilmington, Delaware 19899-1347  
**Phone Number:** (302) 351-9229  
**Fax Number:** (302) 425-4663

FILED  
U.S. DISTRICT COURT  
2008 MAR 18 AM 11:22  
S.D. OF N.Y.

Gregory Warren Werkheiser is a member in good standing of the Bar of the States of Delaware. There are no pending disciplinary proceedings against Gregory Warren Werkheiser in any State or Federal court.

Dated: New York, New York  
March 17, 2008

LAW OFFICES OF ERIC J. GRANNIS

By:   
Eric J. Grannis (EG 8403)

620 Fifth Avenue  
New York, New York 10020  
(212) 903-1025  
*Attorneys for Defendant Loughlin Meghji &  
Co., Inc.*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

OLD LADDER LITIGATION CO., LLC,

Plaintiff,

v.

INVESTCORP BANK B.S.C. et al.

Defendants.

No. 1:08-cv-00876 (RMB-THK)

**DECLARATION OF ERIC  
GRANNIS IN SUPPORT OF  
MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

State of New York     )  
                                  )  
County of New York    )     ss:

Eric Grannis, being duly sworn, hereby deposes and says as follows:

1. I am counsel for Defendant Loughlin Meghji & Co., Inc. ("Loughlin") in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Loughlin's motion to admit Gregory Warren Werkheiser as counsel pro hac vice to represent Loughlin in this matter.

2. I am a member in good standing of the bar of the State of New York and was admitted to practice law on July 2, 1996. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. Mr. Werkheiser is a partner at Morris, Nichols, Arsht & Tunnell LLP in Wilmington, Delaware.

4. I have found Mr. Werkheiser to be a skilled attorney and a person of

integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

5. Accordingly, I am pleased to move the admission of Gregory Warren Werkheiser, pro hac vice.

6. I respectfully submit a proposed order granting the admission of Gregory Warren Werkheiser, pro hac vice, which is attached hereto as Exhibit A.

7. I respectfully submit a certificate of good standing for Gregory Warren Werkheiser, which is hereto attached as Exhibit B.

WHEREFORE it is respectfully requested that the motion to admit Gregory Warren Werkheiser, pro hac vice, to represent Defendant Loughlin in the above captioned matter, be granted.

Dated: New York, New York  
March 17, 2008

LAW OFFICES OF ERIC J. GRANNIS

By: 

Eric J. Grannis (EG 8403)

620 Fifth Avenue  
New York, New York 10020  
(212) 903-1025

*Attorneys for Defendant Loughlin Meghji &  
Co., Inc.*

**EXHIBIT A**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

OLD LADDER LITIGATION CO., LLC,

Plaintiff,

v.

INVESTCORP BANK B.S.C. et al.

Defendants.

No. 1:08-cv-0876 (RMB-THK)

**ORDER FOR ADMISSION  
PRO HAC VICE  
ON WRITTEN MOTION**

Upon the motion of Eric J. Grannis, attorney for Loughlin Meghji & Co. and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

**Applicant's Name:** Gregory Warren Werkheiser  
**Firm Name:** Morris, Nichols, Arsht & Tunnell LLP  
**Address:** Chase Manhattan Centre, 18th Floor  
1201 North Market Street  
**City/State/Zip:** Wilmington, Delaware 19899-1347  
**Phone Number:** (302) 351-9229  
**Fax Number:** (302) 425-4663

is admitted to practice pro hac vice as counsel for Loughlin Meghji & Co. in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:

City, State: New York, New York

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United States District/Magistrate Judge

**EXHIBIT B**

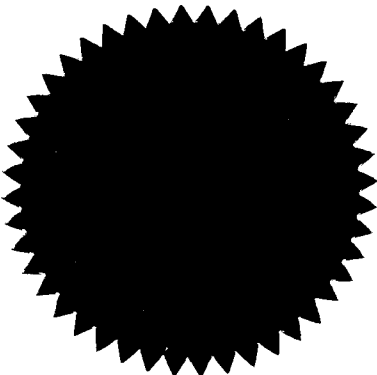
## SUPREME COURT OF THE STATE OF DELAWARE

### CERTIFICATE OF GOOD STANDING

The Clerk of the Supreme Court of the State of Delaware, the highest Court in the State, certifies that **Gregory Warren Werkheiser** was admitted to practice as an attorney in the Courts of this State on **December 12, 1996** and is an **active** member of the Bar of the Supreme Court of the State of Delaware in good standing.

### IN TESTIMONY WHEREOF,

I have hereunto set my hand and affixed the seal of said Court at Dover this 10th day of March 2008.



A handwritten signature in black ink, reading "Cathy L. Howard". The signature is written in a cursive style and is positioned above a horizontal line.

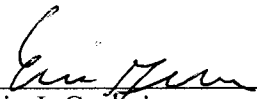
Cathy L. Howard  
Clerk of the Supreme Court

AFFIRMATION OF SERVICE

I, Eric J. Grannis, hereby affirm that I am a member of the Bar of this Court and that on March 17, 2008, I served by First Class mail a copy of the attached document upon all appearing parties:

J. Christopher Shore, Esq.  
White & Case LLP  
1155 Avenue of the Americas  
New York, New York 10036

James J. Lotz, Esq.  
Foley & Mansfield, PLLP  
485 Madison Avenue  
New York, New York 10022

  
Eric J. Grannis